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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROMEO KREINBERG,

Plaintiff,

- against -

THE DOW CHEMICAL COMPANY and
ANDREW N. LIVERIS,

Defendants.

Case No.: 07 CV 4557 (RFP) (JA)

ECF Case

**STIPULATION FOR EXTENSION OF
TIME FOR DEFENDANTS TO RESPOND
TO PLAINTIFF'S COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED by and between plaintiff Romeo Kreinberg and defendants The Dow Chemical Company ("Dow") and Andrew N. Liveris ("Liveris"), that the time for each defendant to move, answer, or otherwise respond to plaintiff's above captioned complaint is extended by two weeks. Thus, the time for defendant Dow to move, answer, or otherwise respond to plaintiff's above captioned complaint is extended through June 20, 2007 and the time for defendant Liveris to move, answer, or otherwise respond to plaintiff's above captioned complaint is extended through July 3, 2007.

1. On May 8, 2007, plaintiff commenced this action in the Supreme Court of the State of New York, County of New York. Plaintiff first effected service upon Dow on May 10, 2007 and upon defendant Liveris on May 30, 2007.

2. On May 30, 2007, defendants removed this action to this Court pursuant to 28 U.S.C. §§ 1441 and 1446.

3. Pursuant to Federal Rule of Civil Procedure 81(c), defendant Dow's response to plaintiff's Complaint is due June 6, 2007 and defendant Liveris' response to plaintiff's Complaint is due June 19, 2007.

4. The parties have mutually agreed to extend each defendant's time to respond to the Complaint by two weeks. Thus, defendant Dow's time to respond to the Complaint has been

extended through June 20, 2007 and defendant Liveris' time to respond to the Complaint has been extended through July 3, 2007.


5. No party will be prejudiced by the requested extension of time and such extension of time is not being sought for purposes of delay, nor will it delay the scheduled trial of this cause.

6. No prior extension of time has previously been sought by defendants.

Dated: June 4, 2007


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Attorneys for Defendants
THE DOW CHEMICAL COMPANY and
ANDREW N. LIVERIS

So Ordered: 15 June 2007


United States District Judge


Victor Marrero